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BELLSOUTH

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November 30, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

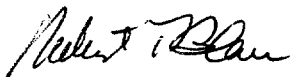
Re: CC Docket No. 98-121

Dear Ms. Salas:

On November 24, 1998 Duane Ackerman, Sid Boren, Bob Blau, Randy New, Allan Price, Bill Stacey, Phil Jacobs, and Tom Hamby, representing BellSouth, met with Commissioner Michael Powell and his legal advisor, Kyle Dixon. The meeting's purpose was to discuss the Sec. 271 process in general and the status of related state regulatory proceedings currently underway in Georgia. Documents appended to the attached letter provided the framework for the discussion that ensued.

Two copies of this notice are filed in accordance with Section 1.1206(a) of the Commission's rules. Please associate this notification with the proceeding identified above.

Sincerely,



Robert T. Blau

Attachment

cc: Commissioner Michael Powell
Kyle Dixon

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List ABCDE

RECEIVED

NOV 30 1998

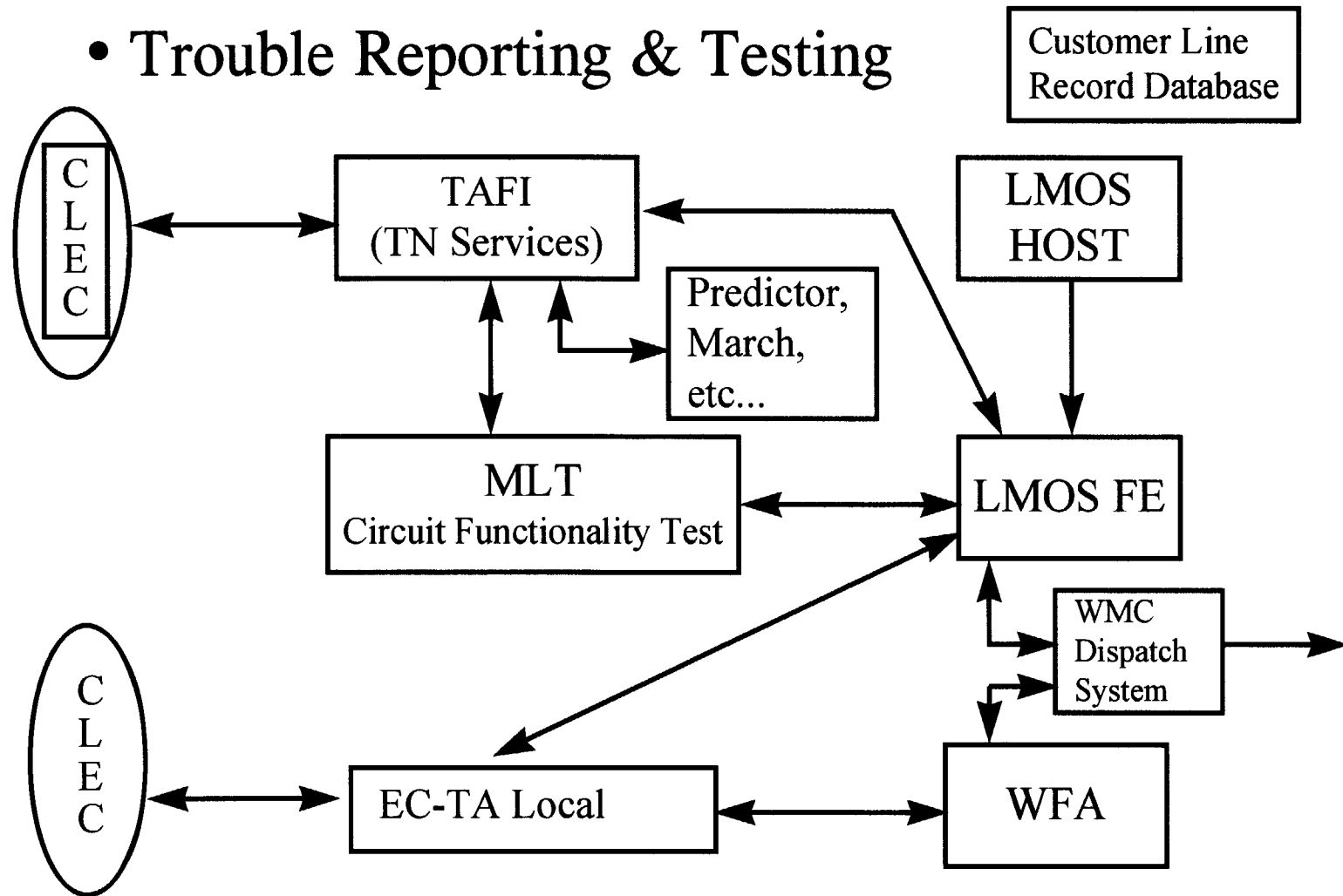
Operating Support System Issues

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

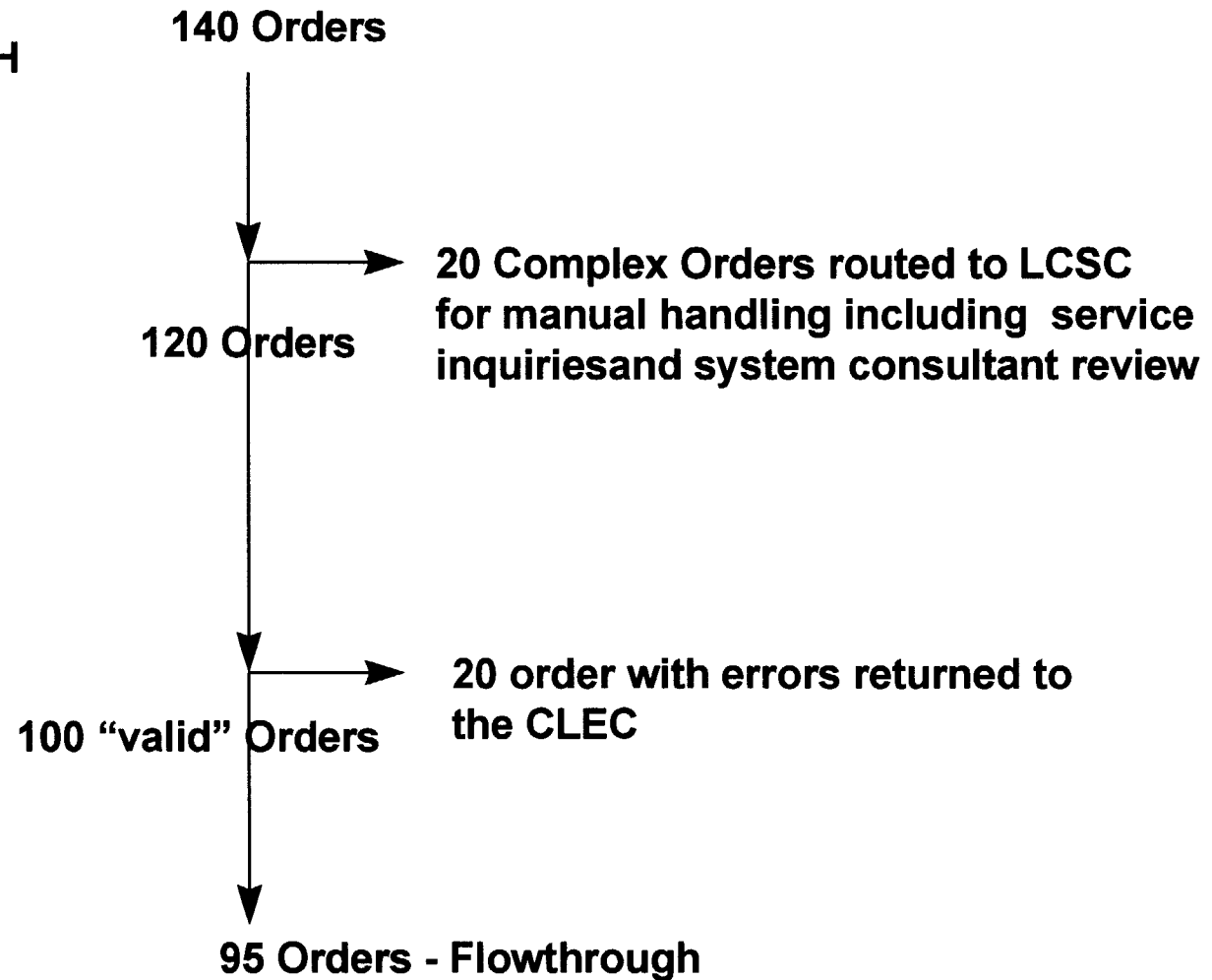
Issue	Matrix reference	Order Paragraph(s)
Repair and Maintenance - TAFI integration	Page 2, Item 3	150-161
3rd Party Testing - demonstration of Operational Readiness	Page 4, Item 2	140
Complex Ordering / Partial Migration Orders	Page 4, Item 1	143-144
Flowthrough	Page 2, Item 2	107
Retail Analogues / Performance Standards / Statistical Analysis	Page 3, Item 3	93,105-123
Trunk Blockage Measurement	Page 1, Item 3	77
Operator Services Performance Measurements	Page 9, Item 2	245-247

CLEC OSS Access

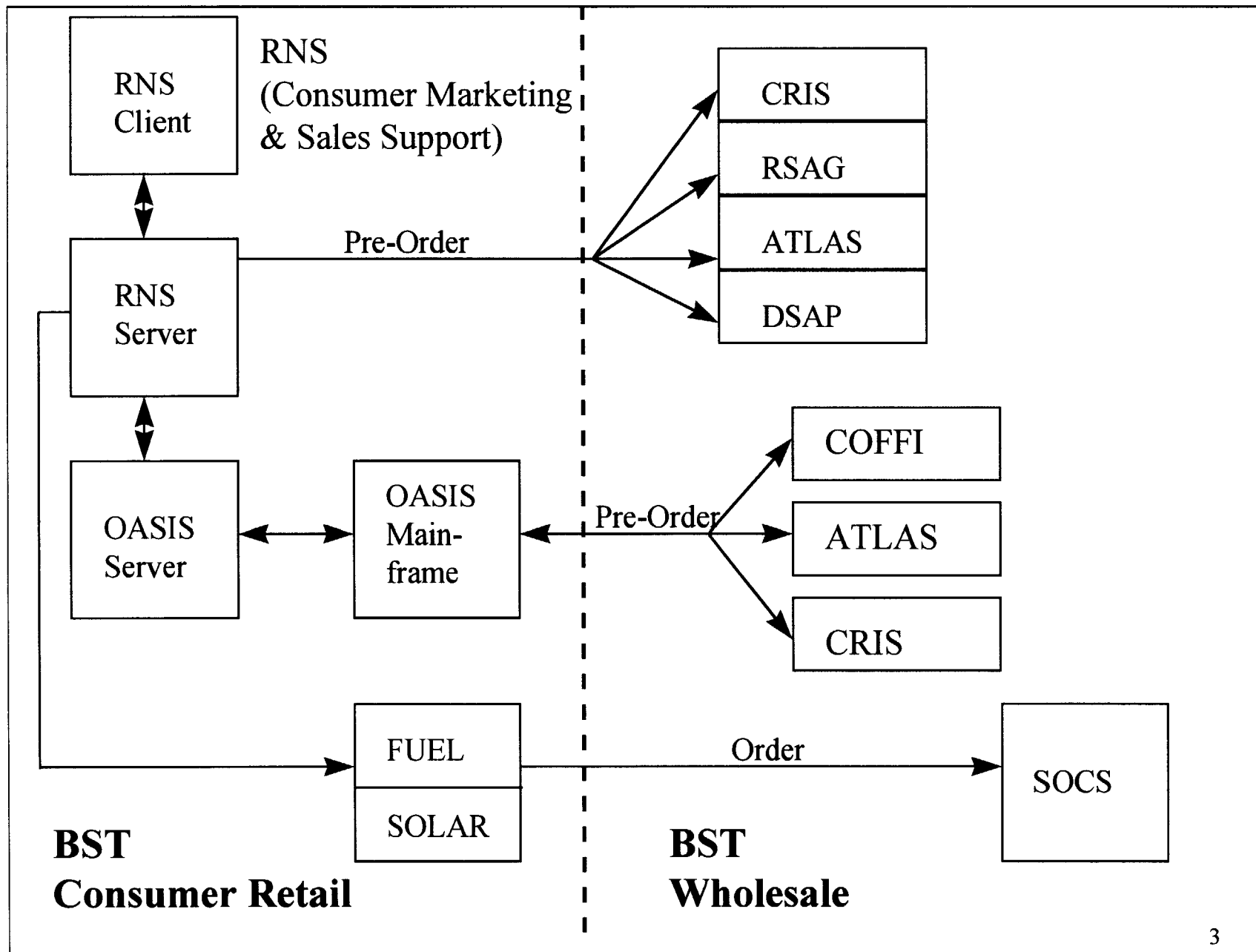
- Trouble Reporting & Testing

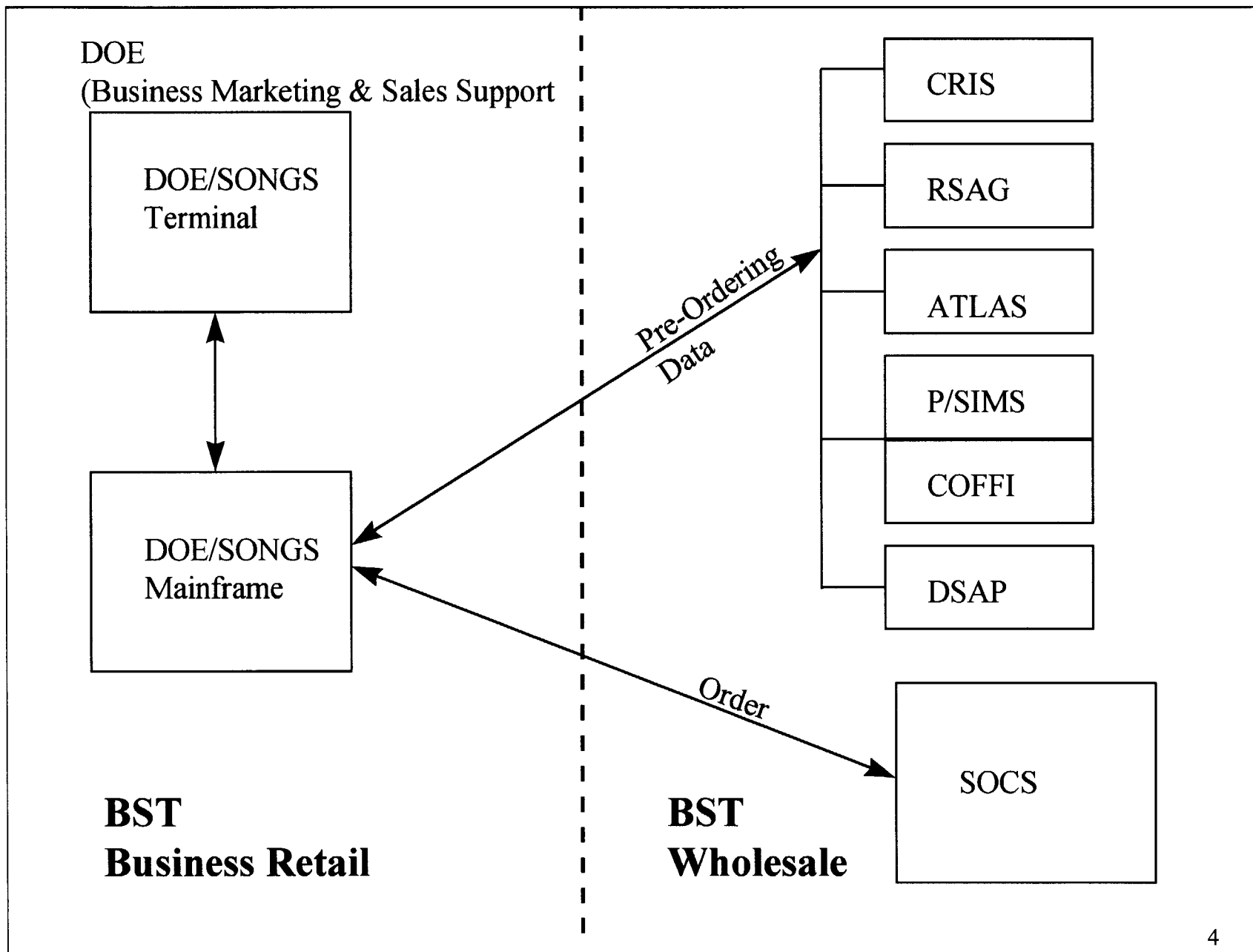


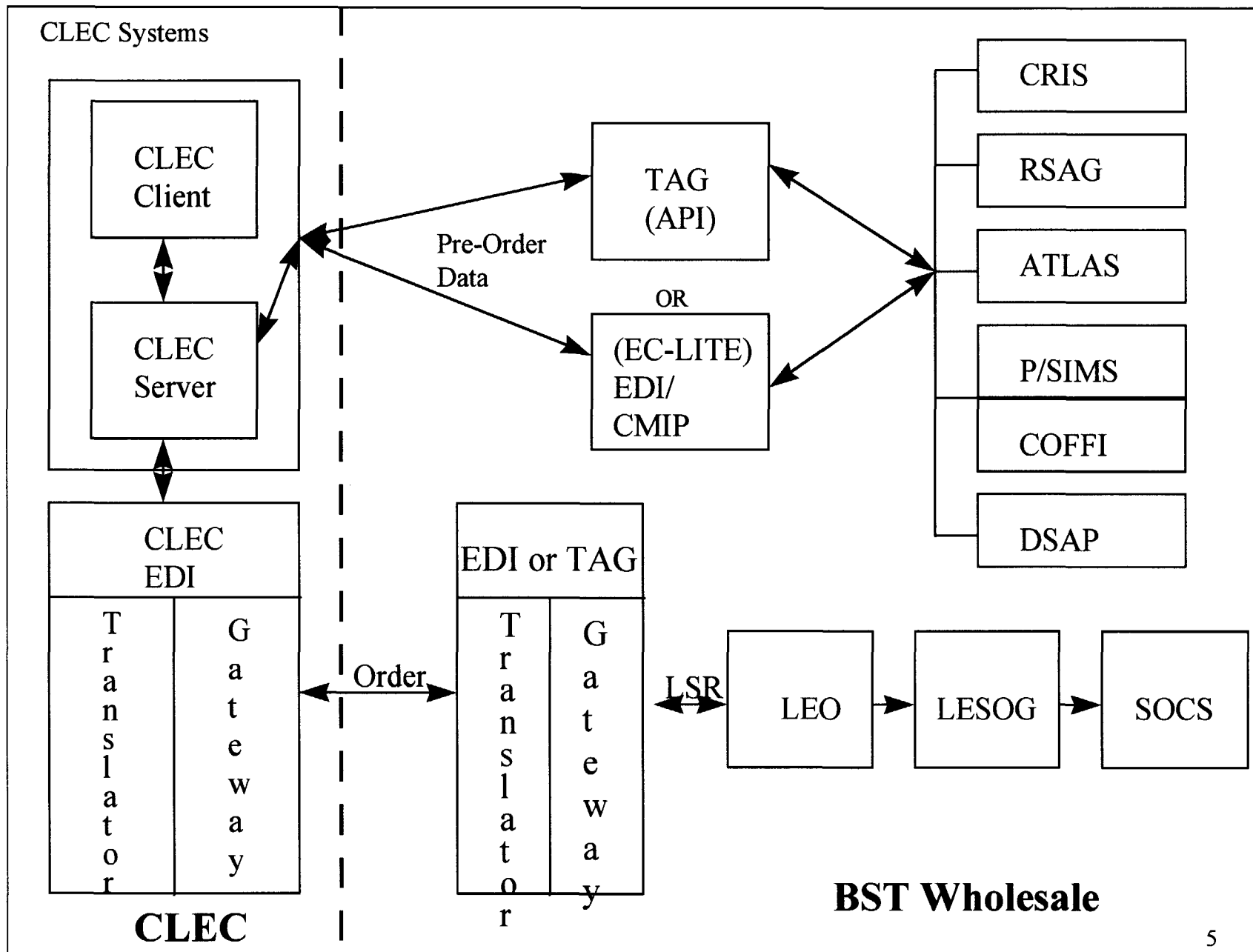
FLOWTHROUGH



Flowthrough= 95%? or 95/120 (79%)? or 95/140 (67%)?







Mar '95 Georgia General Assembly passed the Telecommunication and Competition Development Act of 1995. Effective 7/1/95

- Authorized multiple local competition**
- Authorized IntraLATA presubscription by January 1, 1997 (Key Georgia legislation intended for this date to coincide with BellSouth's entry into interLATA markets). To date, BLS has lost 1.3m IntraLATA toll customers or 30% market share.**

Nov '95 Georgia PSC began a resale docket prior to the Federal Act. Discount rate of 17.3% for business and 20.3% for residence were set. 5 days of hearings; 1,000 transcript pages

- Dec '95** **Georgia PSC began an inquiry on permanent number portability and adopted a plan in advance of the Federal Act. Permanent Number Portability is being offered in the Atlanta MSA**
- Mar –
Jun '96** **Georgia PSC handled four major arbitration proceedings involving AT&T, MCI, MFS and Sprint. Many policy issues were decided including pricing policy for recombinations; 12 days of hearings, 4,000 pages of transcript and PSC orders totaling 200 pages**
- Fall '96** **GA PSC opened the cost docket. The PSC adopted a forward looking TELRIC model. Model adopted prices very similar to FCC proxy, i.e., loop price \$16.51 GA PSC, \$16.09 FCC. 5 days of hearings, 6,000 pages of transcript, 65 page PSC order**
-

- Fall '96** **GA PSC adopted expedited dispute resolution process for complaints that provides for an emergency hearing within 5 days.**
- Early '97** **GA PSC opened a separate proceeding on electronic interface, i.e., OSS. BellSouth demonstrated OSS live in a hearing. GA PSC Staff developed 100 item matrix to be accomplished. Monthly meetings with CLECs and monthly status reports are submitted to PSC. BellSouth has implemented all of the significant items on the matrix. 3 days of hearings, 750 transcript pages and 35 page PSC order**
- Mid '97** **GA PSC opened a performance measurements proceeding. GA PSC adopted an extensive set of performance measurements. BellSouth has filed 7 months of data. GA PSC also adopted an expedited dispute resolution process.**

**1996-
1998**

GA PSC has conducted multiple reviews/hearings on BellSouth SGAT and the 14 point checklist. 45 days of multiple hearings, 6,000 pages of transcript, 100 pages of PSC orders, and on 10/15/98 a 160 page detail staff report on 271 compliance discussing the 14 point check list. The Staff did not recommend Item 2, 4 & 14. BellSouth filed a response to the Staff report on 11/13/98 with additional data.

General areas of agreement between GA PSC and FCC:

- (1) Adoption of TELRIC**
- (2) Inclusion of vertical features in the unbundled switch rate**
- (3) GA PSC's workshops and monthly collaborative process on OSS**

- (4) Specific rate for space preparation in the collocation area**
- (5) Constant pressure by GA PSC including performance measurements to make collocation easy and inexpensive for CLECs**

Primary areas of policy disagreement between GA PSC and FCC:

- (1) Pricing policy for BellSouth recombined unbundled network elements (UNEs) that duplicate a resold service**
- (2) Deaveraging of UNE prices prior to establishment of a universal service fund**

STATUS OF 271

CHECKLIST ITEMS

GA PSC

APPROVED

- 1 (Interconnection)
- 5 (Transport)
- 6 (Switching)
- 7 (911/E911, Oper Svcs)
- 8 (White Pages)
- 11 (Number Portability)
- 12 (Dialing Parity)

NO DETERMINATION

- 3 (Poles, Ducts, Conduit)
- 9 (Number Administration)
- 10 (Access to Data Bases)
- 13 (Reciprocal Compensation)

DOES NOT RECOMMEND

- 2 (Unbundled Network Elements)
- 4 (Loops)
- 14 (Resale)

FCC

APPROVED

- 3 (Poles, Ducts, Conduit)
- 7(I) (911/E911)
- 8 (White Pages)
- 9 (Number Administration)
- 10 (Access to Data Bases)
- 12 (Dialing Parity)
- 13 (Reciprocal Compensation)

DOES NOT APPROVE

- 1 (Interconnection)
- 2 (Unbundled Network Elements)
- 4 (Loops)
- 5 (Transport)
- 6 (Switching)
- 7 II & III (Operator Services
DA Data Bases)
- 11 (Number Portability)
- 14 (Resale)

**Competitive Summary Related
To Checklist Item #1
(Interconnection)**

	<u>GA</u>	<u>BLS Region</u>
Certificated CLECs		
Approved by GA PSC	172	1018
Pending	26	166
 Operational CLECs	 45	 172
 CLECs with Switching Capability	 26	 126
	<u>GA</u>	<u>BLS Region</u>
Total Local Interconnection Trunks	79383	290,725

**Competitive Summary Related
To Checklist Item #2
(Unbundled Network Elements)**

	<u>GA</u>	<u>BLS Region</u>
Collocation Interconnectors	20	38
Collocation Arrangements	213	756
Physical	134	409
Virtual	79	347
Wire Centers with Collocation	55	274
 BellSouth Access Lines Available to Collocators		
Business	833,106	
Residence	978,414	
	<hr/>	
Total Access Lines Available	1,811,520	
 CLEC NXX Codes Opened		
	557 or 5.57 million	telephone numbers
Ported Telephone Numbers	23,289	

Competitive Summary Related

To Checklist Item #4

(Loops)

	<u>GA</u>	<u>BLS Region</u>
Total Unbundled Loops	6,659	33,742

**Competitive Summary Related
To Checklist Item #14**

	<u>GA</u>	<u>BLS Region</u>
Total Resold Lines	107,067	490,278
Business Lines	42,745	217,248
Residence Lines	63,158	288,499
ISDN	559	3,384
Private Lines/Data	605	1,147

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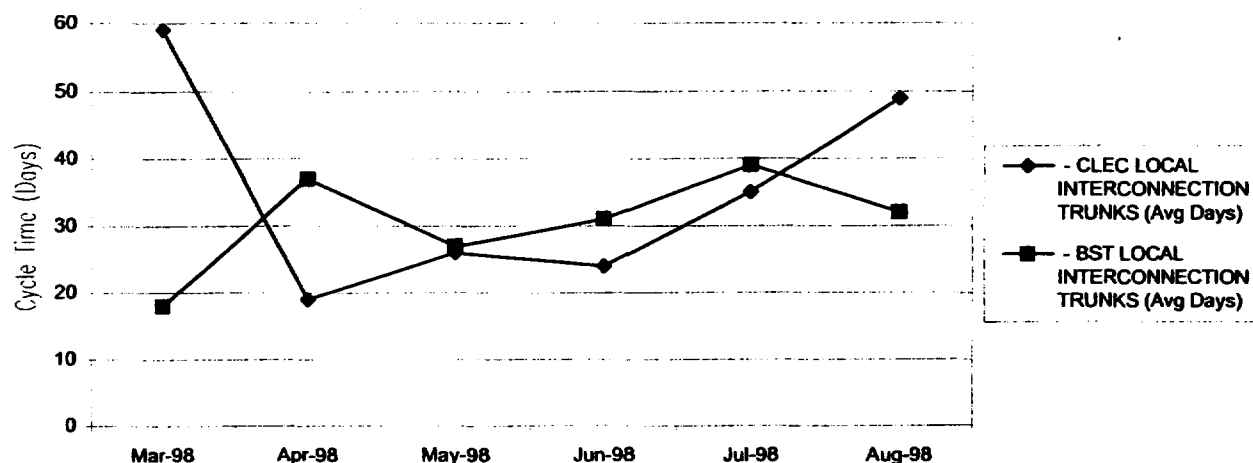
Overall Competitive Summary

	<u>GA</u>	<u>BLS Region</u>
Total Facility-Based Lines (Estimated)	37,042	181,481
Facility-Based Business	29,376	169,325
Facility-Based Residential	7,666	12,156
Total CLEC-Provided Access Lines	144,109	671,769

ORDER COMPLETION INTERVAL

	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- CLEC LOCAL INTERCONNECTION TRUNKS (Avg Days)	59	19	26	24	35	49
- BST LOCAL INTERCONNECTION TRUNKS (Avg Days)	18	37	27	31	39	32

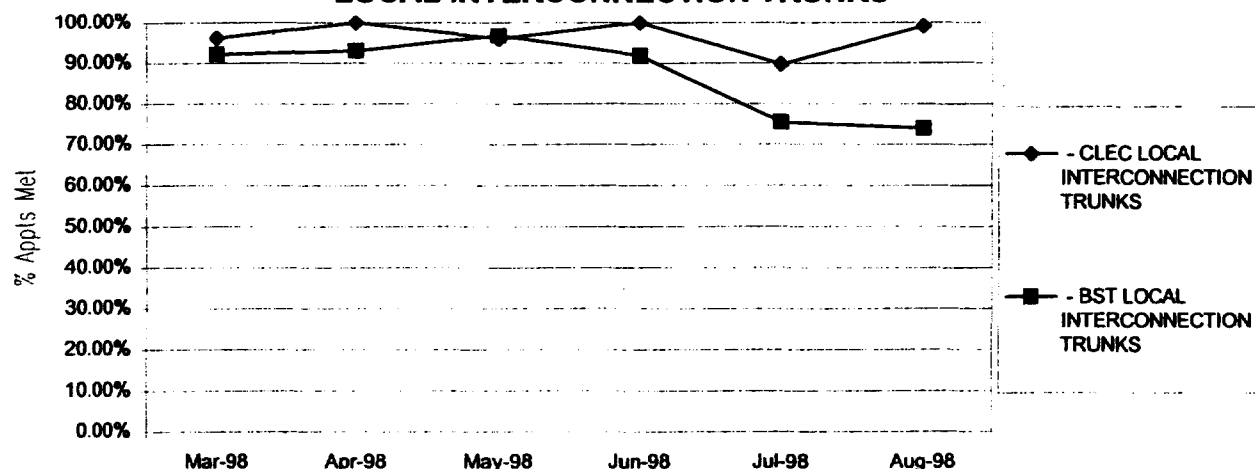
Order Completion Interval - Georgia LOCAL INTERCONNECTION TRUNKS



INSTALLATION APPOINTMENTS MET

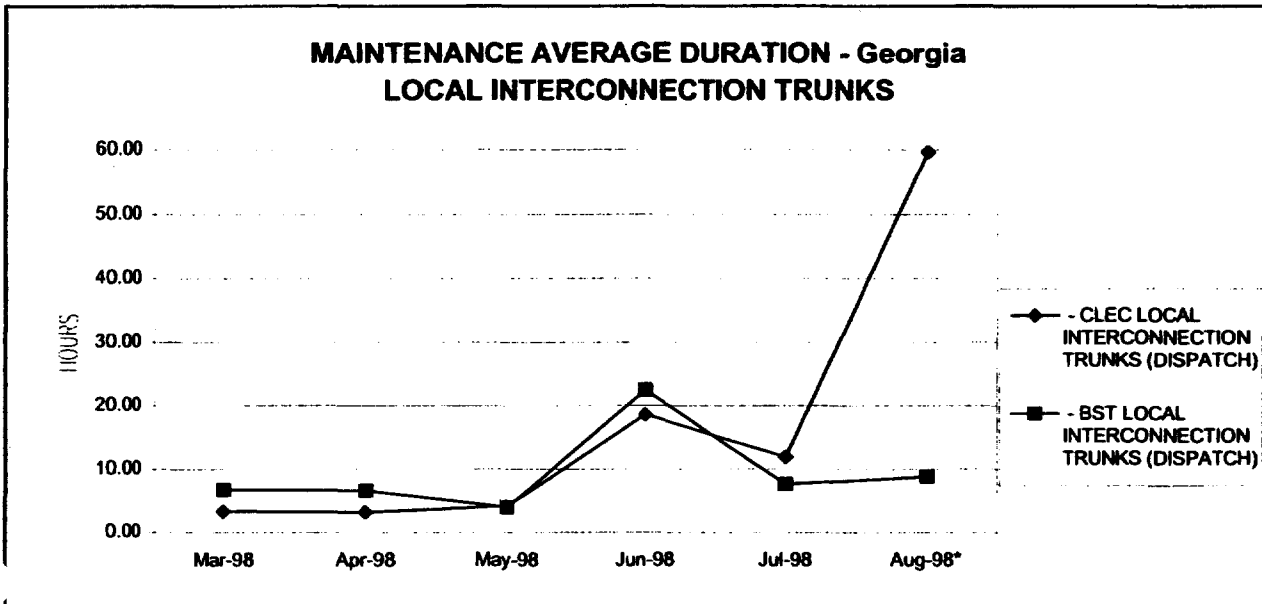
	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- CLEC LOCAL INTERCONNECTION TRUNKS	96.16%	100.00%	95.98%	100.00%	89.74%	99.16%
- BST LOCAL INTERCONNECTION TRUNKS	92.17%	93.00%	96.76%	91.86%	75.38%	73.86%

% Due Dates Met - Georgia LOCAL INTERCONNECTION TRUNKS



MAINTENANCE AVERAGE DURATION

	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98*
- CLEC LOCAL INTERCONNECTION TRUNKS (DISPATCH)	3.32	3.19	4.16	18.56	11.90	59.61
- BST LOCAL INTERCONNECTION TRUNKS (DISPATCH)	6.77	6.59	3.96	22.46	7.64	8.83

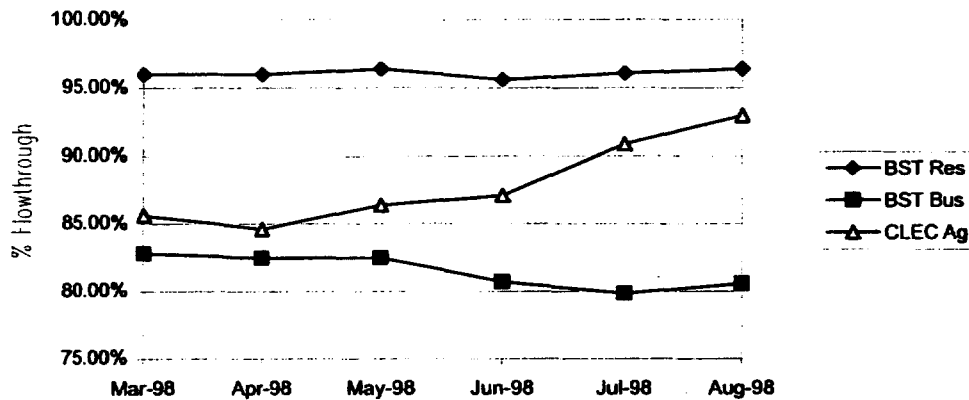


* Data is the result of two trunk failures totaling over 119 hours of outage in August.

OSS Percent Flowthrough

	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
BST Res	96.00%	96.00%	96.40%	95.60%	96.10%	96.40%
BST Bus	82.82%	82.48%	82.51%	80.69%	79.86%	80.55%
CLEC Ag	85.60%	84.60%	86.38%	87.08%	90.88%	92.97%

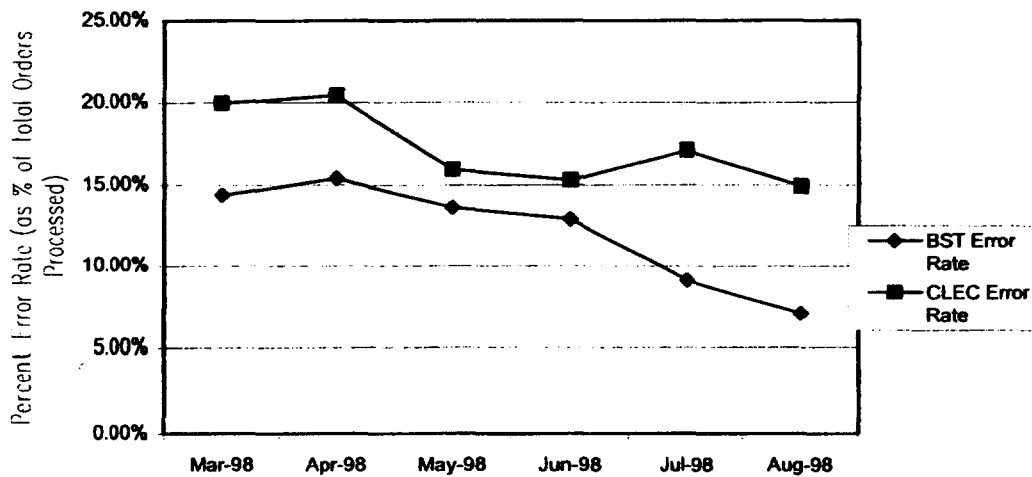
BST & CLEC Aggregate OSS Percent Flowthrough



ERROR RATES

	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
BST Error Rate	14.40%	15.40%	13.62%	12.92%	9.12%	7.03%
CLEC Error Rate	19.95%	20.42%	15.91%	15.28%	17.09%	14.91%

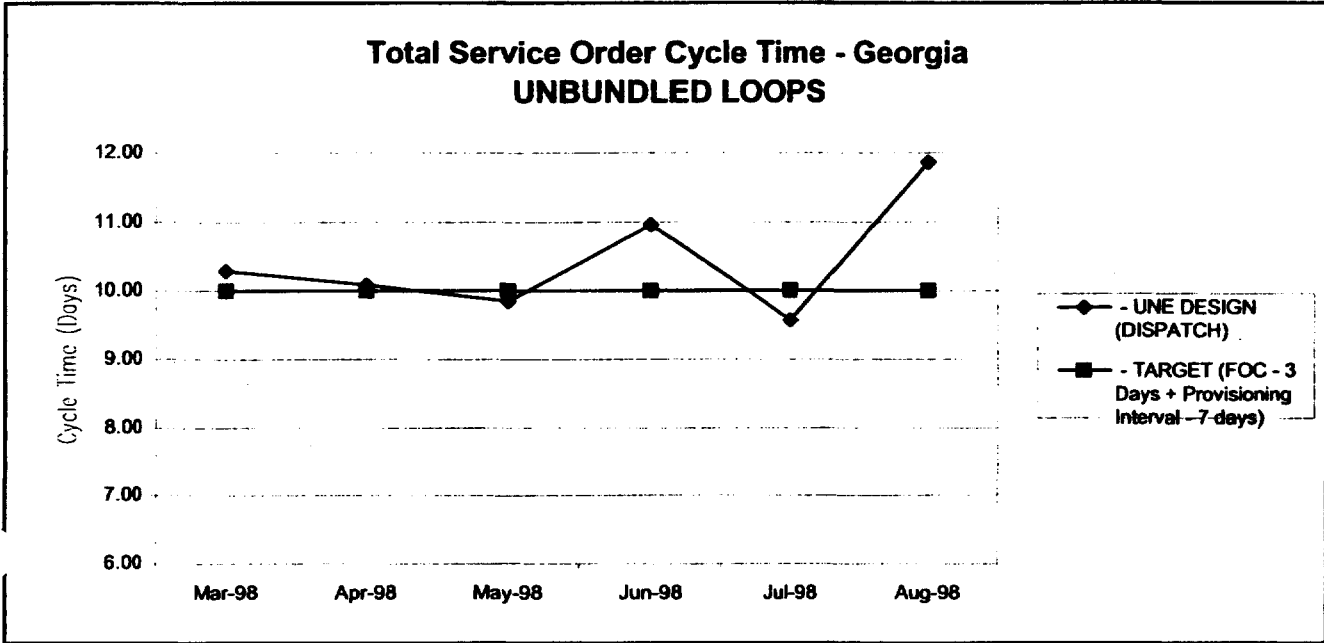
Flowthrough Error Rate



TOTAL SERVICE ORDER CYCLE TIME (DAYS)

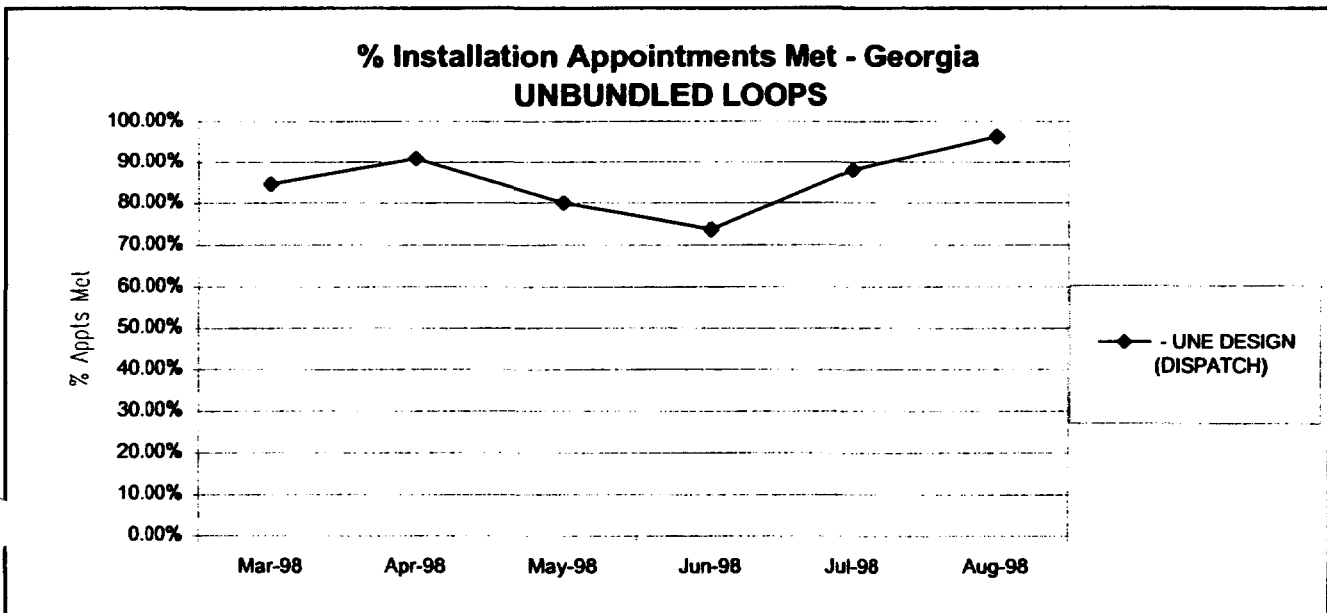
TSOCT = FOC + AVG. INST. INTERVAL
NON - MECHANIZED LSRs

	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- UNE DESIGN (DISPATCH)	10.29	10.09	9.85	10.96	9.57	11.86
- TARGET (FOC - 3 Days + Provisioning Interval - 7 days)	10.00	10.00	10.00	10.00	10.00	10.00



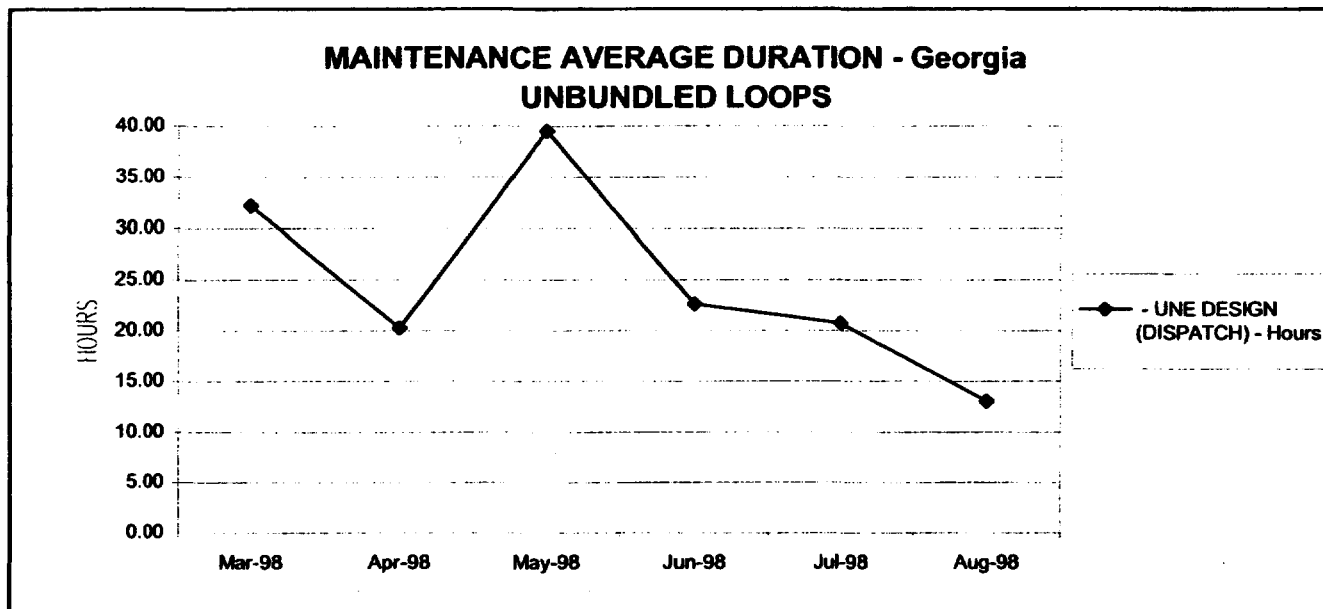
INSTALLATION APPOINTMENTS MET

	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- UNE DESIGN (DISPATCH)	84.70%	90.90%	80.00%	73.60%	88.10%	96.30%



MAINTENANCE AVERAGE DURATION

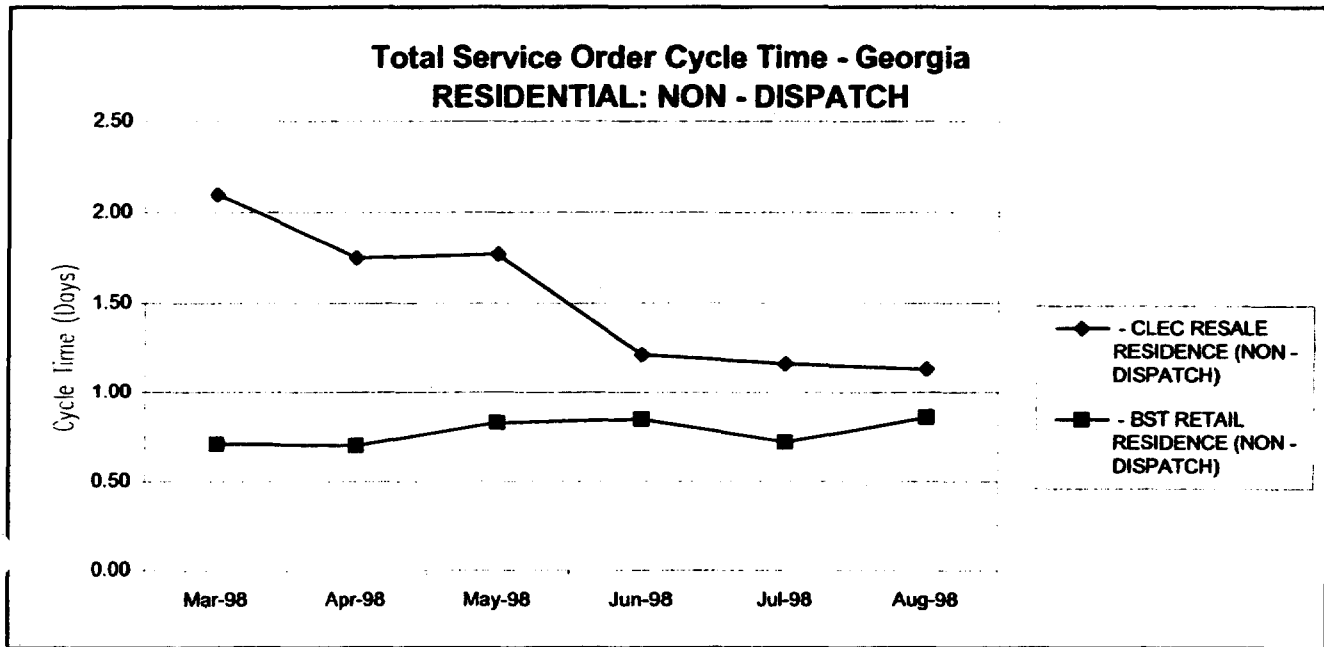
	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- UNE DESIGN (DISPATCH) - Hours	32.25	20.26	39.50	22.60	20.69	13.04



TOTAL SERVICE ORDER CYCLE TIME (DAYS)

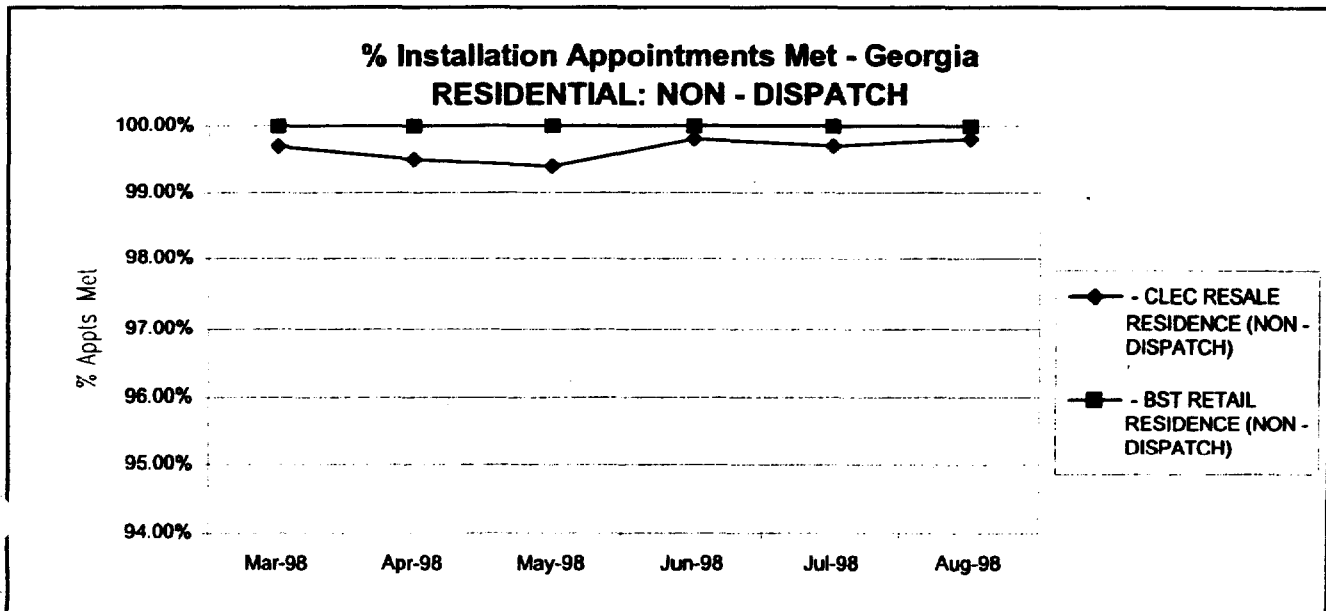
TSOCT = FOC + AVG. INST. INTERVAL MECHANIZED
LSRs with No Errors

	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- CLEC RESALE RESIDENCE (NON - DISPATCH)	2.10	1.75	1.77	1.21	1.16	1.13
- BST RETAIL RESIDENCE (NON - DISPATCH)	0.71	0.70	0.83	0.85	0.72	0.86



INSTALLATION APPOINTMENTS MET

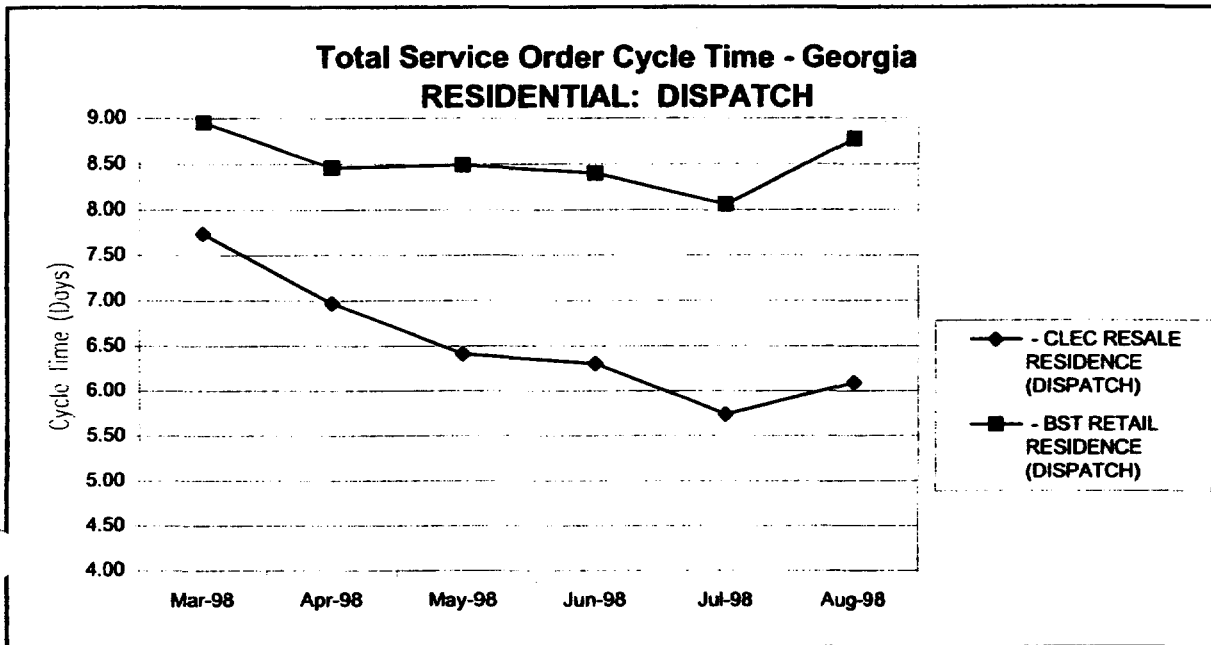
	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- CLEC RESALE RESIDENCE (NON - DISPATCH)	99.70%	99.50%	99.40%	99.80%	99.70%	99.80%
- BST RETAIL RESIDENCE (NON - DISPATCH)	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%



TOTAL SERVICE ORDER CYCLE TIME (DAYS)

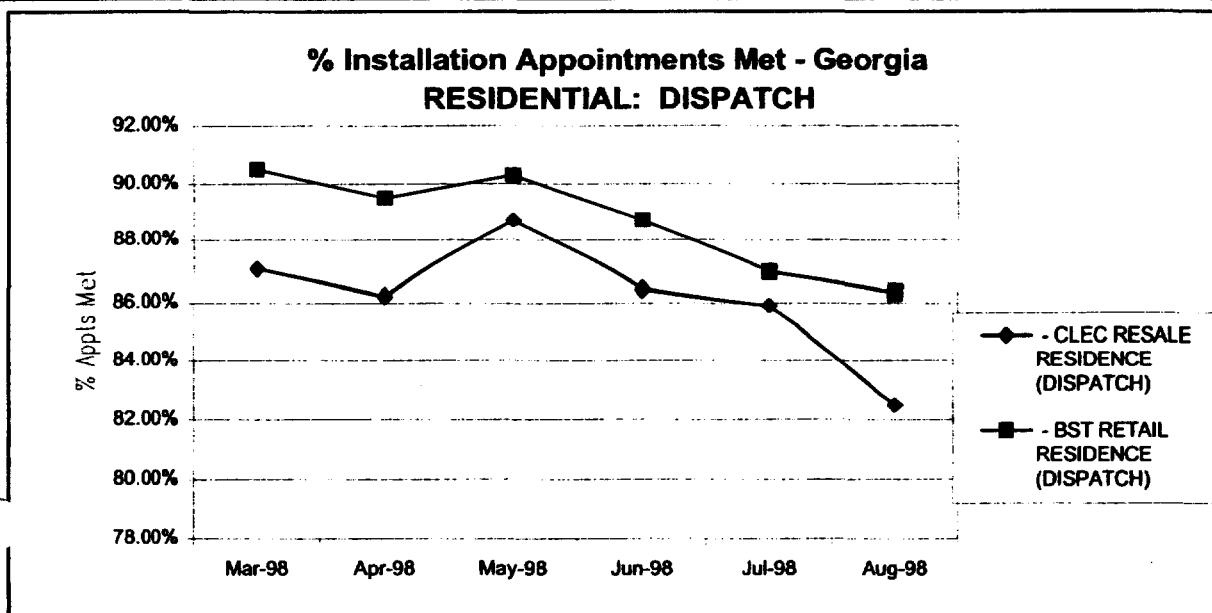
TSOCT = FOC + AVG. INST. INTERVAL
MECHANIZED LSRs with No Errors

	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- CLEC RESALE RESIDENCE (DISPATCH)	7.74	6.97	6.41	6.30	5.74	6.09
- BST RETAIL RESIDENCE (DISPATCH)	8.95	8.46	8.49	8.40	8.06	8.77



INSTALLATION APPOINTMENTS MET

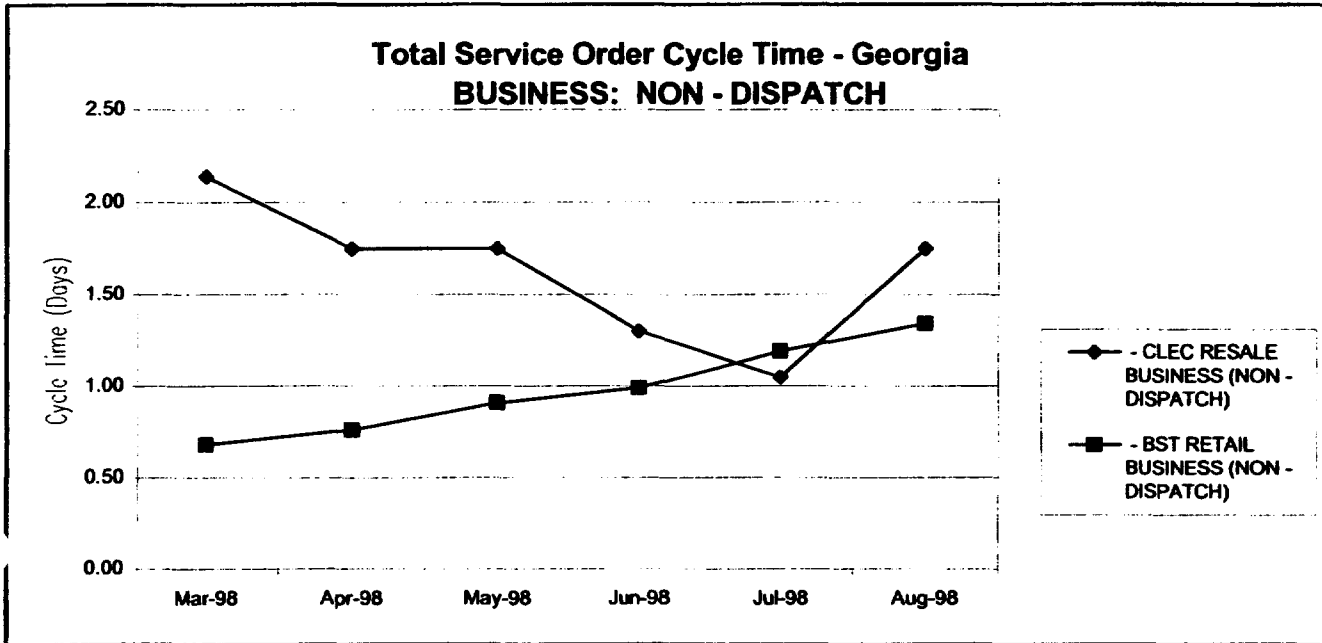
	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- CLEC RESALE RESIDENCE (DISPATCH)	87.00%	86.20%	88.70%	86.40%	85.90%	82.50%
- BST RETAIL RESIDENCE (DISPATCH)	90.50%	89.50%	90.30%	88.70%	86.90%	86.30%



TOTAL SERVICE ORDER CYCLE TIME (DAYS)

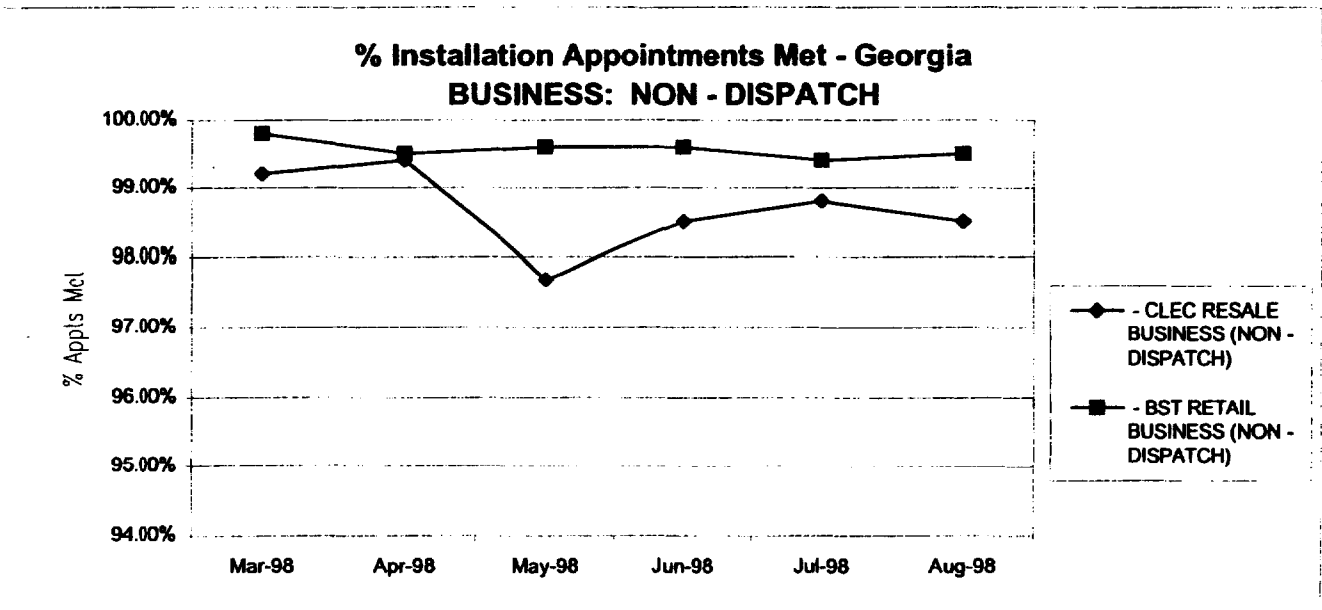
TSOCT = FOC + AVG. INST. INTERVAL MECHANIZED
LSRs with No Errors

	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- CLEC RESALE BUSINESS (NON - DISPATCH)	2.14	1.75	1.75	1.30	1.05	1.75
- BST RETAIL BUSINESS (NON - DISPATCH)	0.68	0.76	0.91	0.99	1.19	1.34



INSTALLATION APPOINTMENTS MET

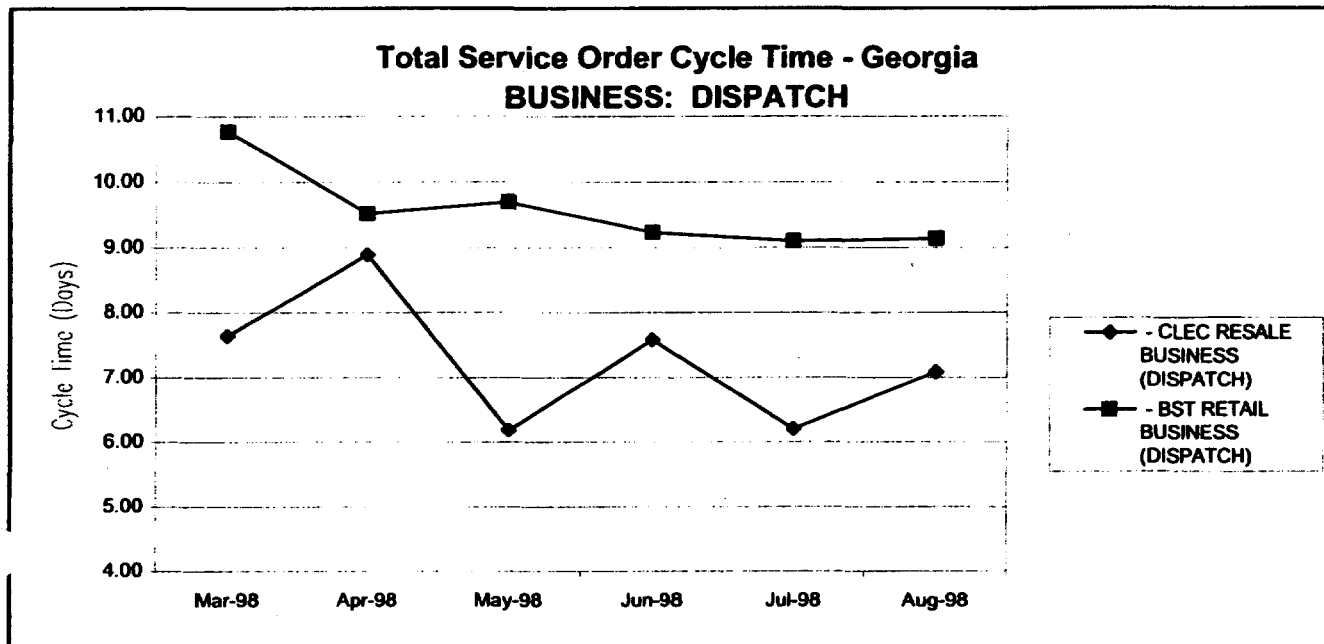
	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- CLEC RESALE BUSINESS (NON - DISPATCH)	99.20%	99.40%	97.70%	98.50%	98.80%	98.50%
- BST RETAIL BUSINESS (NON - DISPATCH)	99.80%	99.50%	99.60%	99.60%	99.40%	99.50%



TOTAL SERVICE ORDER CYCLE TIME (DAYS)

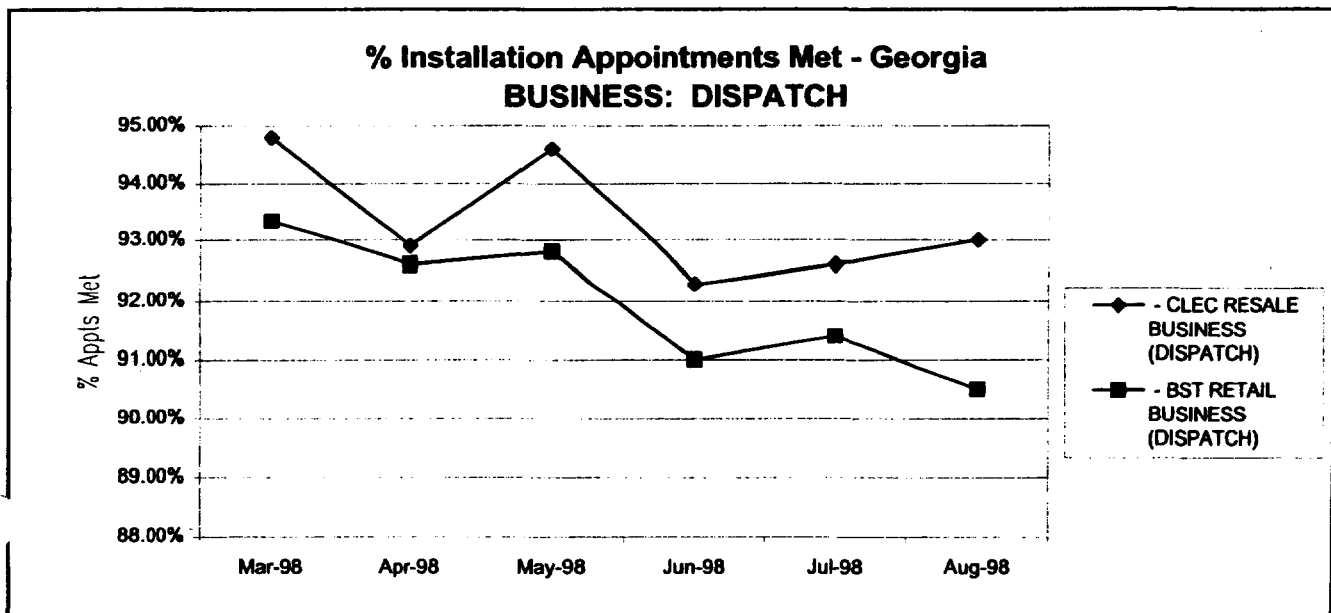
TSOCT = FOC + AVG. INST. INTERVAL MECHANIZED
LSRs with No Errors

	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- CLEC RESALE BUSINESS (DISPATCH)	7.64	8.89	6.19	7.58	6.21	7.09
- BST RETAIL BUSINESS (DISPATCH)	10.77	9.52	9.70	9.23	9.10	9.14



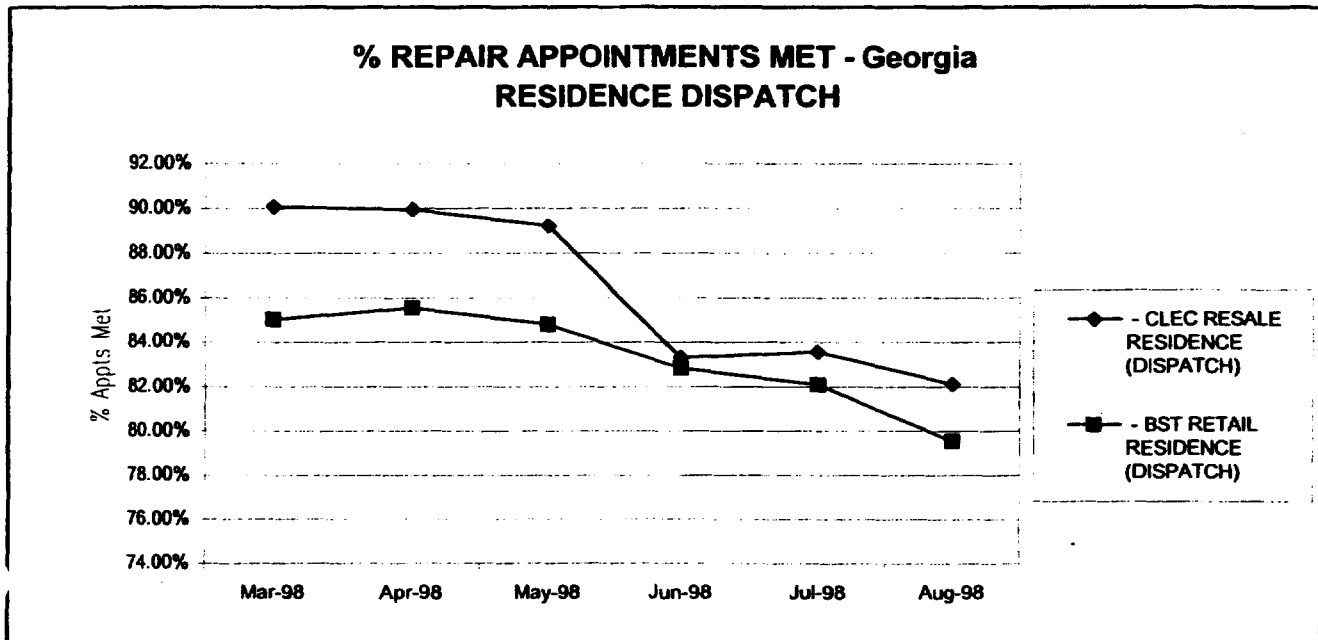
INSTALLATION APPOINTMENTS MET

	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- CLEC RESALE BUSINESS (DISPATCH)	94.80%	92.90%	94.60%	92.30%	92.60%	93.00%
- BST RETAIL BUSINESS (DISPATCH)	93.33%	92.60%	92.80%	91.00%	91.40%	90.50%



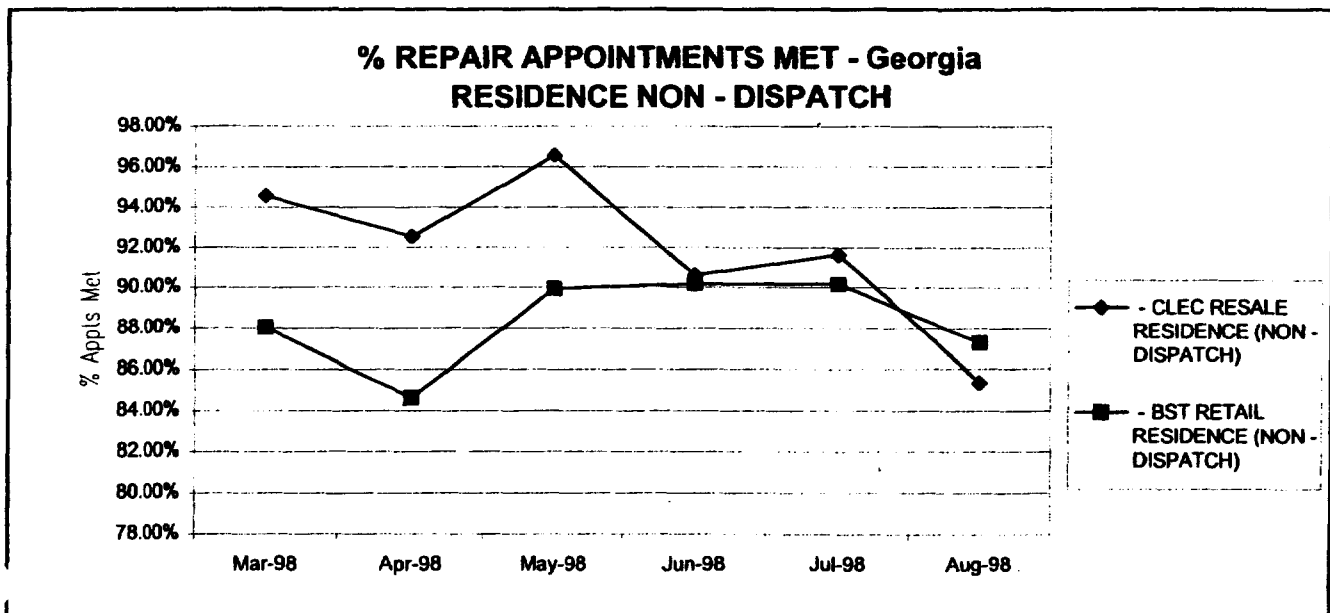
% REPAIR APPOINTMENTS MET

	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- CLEC RESALE RESIDENCE (DISPATCH)	90.08%	89.95%	89.23%	83.31%	83.57%	82.12%
- BST RETAIL RESIDENCE (DISPATCH)	85.03%	85.55%	84.80%	82.83%	82.10%	79.55%



% REPAIR APPOINTMENTS MET

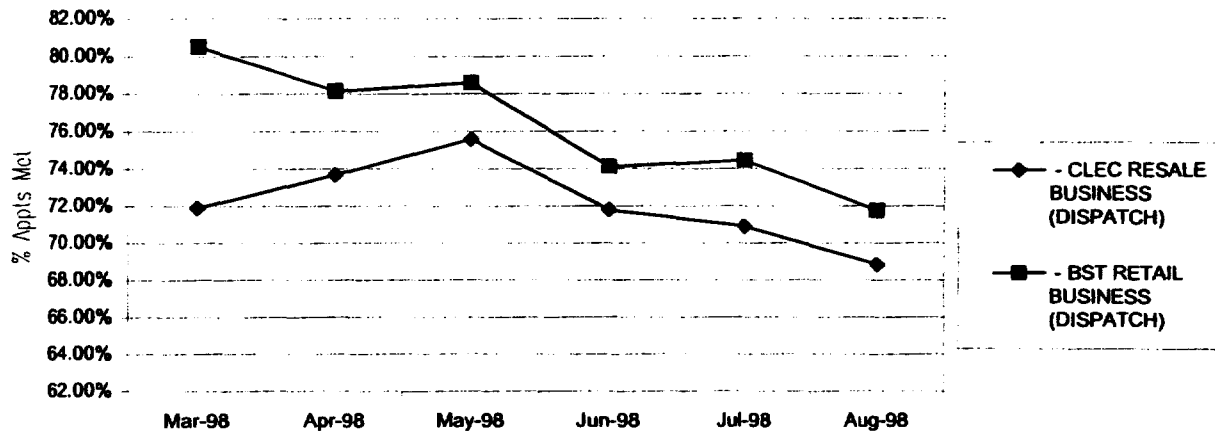
	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- CLEC RESALE RESIDENCE (NON - DISPATCH)	94.57%	92.54%	96.56%	90.62%	91.63%	85.36%
- BST RETAIL RESIDENCE (NON - DISPATCH)	88.03%	84.61%	89.94%	90.18%	90.15%	87.28%



% REPAIR APPOINTMENTS MET

	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- CLEC RESALE BUSINESS (DISPATCH)	71.90%	73.68%	75.57%	71.80%	70.90%	68.84%
- BST RETAIL BUSINESS (DISPATCH)	80.51%	78.14%	78.58%	74.11%	74.43%	71.75%

% REPAIR APPOINTMENTS MET - Georgia BUSINESS DISPATCH



% REPAIR APPOINTMENTS MET

	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98
- CLEC RESALE BUSINESS (NON - DISPATCH)	83.11%	89.58%	89.89%	90.88%	85.59%	84.37%
- BST RETAIL BUSINESS (NON - DISPATCH)	90.52%	83.40%	90.61%	87.78%	87.69%	85.20%

% REPAIR APPOINTMENTS MET - Georgia BUSINESS NON - DISPATCH

